

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

SOCORRO TREJO,

Plaintiff,

vs.

Case No. 1:15-cv-00704-LF-KBM

SAFEWAY INSURANCE GROUP;  
SAFEWAY INSURANCE COMPANY;  
ELIZABETH GEORGE;  
CRAIG MARTIN;  
DALE BRO, individually and d/b/a  
THE INSURANCE STORE; and  
JOHN DOE, Adjusters and Agents;

Defendants.

**STIPULATION OF DISMISSAL OF ALL CLAIMS**  
**WITHOUT PREJUDICE**

**COMES NOW** Plaintiff Socorro Trejo, by and through her counsel of record, Bleus & Associates, LLC (George Anthony Bleus, Esq. and Nicholas J. Rimmer, Esq.), and Defendants Safeway Insurance Group, Safeway Insurance Company, Elizabeth George, and Craig Martin, by and through Defendants' counsel of record, Butt, Thornton & Baehr, P.C. (James H. Johansen, Esq. and Felicia Boyd, Esq.), and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), hereby stipulates to the dismissal of any and all claims against all Defendants contained in Plaintiff's *Complaint for Personal Injury & to Recover Damages for Breach of Contract; Insurance Company Bad Faith; Unfair Insurance Practices Act (UIPA); Violation of Unfair Business & Trade Act; Intentional Infliction of Emotional Distress; Fraud; Negligent Misrepresentation; and Unreasonable Delay*, including those claims brought or that could have been brought, without prejudice. Each party is to bear its own attorneys' fees and costs.

Respectfully Submitted,

**BLEUS & ASSOCIATES, LLC**

/s/ Nicholas J. Rimmer

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*and*

**BUTT, THORNTON & BAEHR, P.C.**

Approved via email on 12/1/15 by:

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